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Subject:
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Time Critical Removal Action – Former Plainwell Impoundment
Monthly Report (May 2007)

INDUSTRIAL

Dear Sam:

Attached is the third monthly progress report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Time Critical Removal Action. This progress report is submitted in accordance with Section 19A of the February 2007 Administrative Settlement Agreement and Order on Consent for Removal Action (Docket No. V-W-07-C-863).

Date:
June 15, 2007

Contact:
Steve Garbaciak

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If you have any questions, please do not hesitate to contact me.

Sincerely,

Email:
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ARCADIS of New York, Inc.

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Imagine the result

**MONTHLY REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/
KALAMAZOO RIVER SUPERFUND SITE
TIME CRITICAL REMOVAL ACTION – FORMER PLAINWELL IMPOUNDMENT**

REPORT #3, MAY 2007

**PREPARED BY ARCADIS BBL
JUNE 15, 2007**

ON BEHALF OF THE KALAMAZOO RIVER STUDY GROUP

SUBMITTED TO

**SAMUEL BORRIES, ON-SCENE COORDINATOR
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Monthly Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site TCRA**

REPORT #3, MAY 2007

Significant Developments and Activities During the Period

- On May 1, the KRSG received a copy of the Plainwell Dam Emergency Action Plan from the MDEQ.
- On May 4, the USEPA transmitted a copy of a resolution from Zeeland Township regarding the potential disposal of TCRA material at the Zeeland Township Landfill.
- On May 7, the USEPA transmitted polygon interpolation from the National Oceanographic and Atmospheric Administration (NOAA) for the former Plainwell Impoundment to the KRSG, MDEQ, and CDM.
- On May 8, the KRSG received a letter from the USEPA regarding a modification to the Plainwell Work Plan concerning delineation of areas based on concentrations of polychlorinated biphenyl.
- On May 9, the KRSG submitted a buoy permit application to the MDNR in order to place buoys upstream and downstream of the work areas to prohibit boat traffic on the river during TCRA activities.
- On May 10, the KRSG submitted a draft construction schedule to the USEPA.
- On May 16, the MDNR issued a permit to the KRSG for the placement of buoys and warning signs upstream and downstream of the work areas to notify individuals of the river closure and prohibition of boat traffic on the river during TCRA activities.
- On May 17, the KRSG met with the MDNR near the Plainwell Dam to discuss language for the warning signs to be placed upstream and downstream of the work areas.
- On May 23, the USEPA notified the KRSG of approval of the *Multi-Area Quality Assurance Project Plan* (QAPP), provided corrections are made per the letter notification of approval.
- On May 29, the KRSG submitted a RCRA Subtitle C Site Identification Form to the USEPA to apply for a Site EPA ID Number to dispose of waste materials generated during the TCRA.
- On May 31, the KRSG submitted a letter to the Michigan Department of Transportation (MDOT) requesting permission to access the Highway 131 bridge right-of-way in Plainwell, Michigan.
- By May 31, the KRSG had obtained property access agreements, as required by Paragraph 23 of the TCRA AOC (Table A), from six property owners.

**Monthly Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site TCRA**

REPORT #3, MAY 2007

Data Collected and Field Activities Conducted During the Period

- During the week of May 7, the KRSG remobilized and continued site preparation (clearing and grubbing, installing silt fences, constructing access roads, and installing site security measures) at the former Plainwell Impoundment. Samples WC-A1, WC-A3, and K25700 through K25706 were collected.
- During the week of May 14, the KRSG continued site preparation (clearing and grubbing, installing silt fences, constructing access roads, and installing site security measures) at the former Plainwell Impoundment, began grading of Staging Area 1N, received shipments of aggregate materials, received a shipment of turbidity curtains, and collected two composite samples from a stockpile of concrete to determine if the material meets the State's inert criteria for access road construction.
- During the week of May 21, the KRSG continued site preparation (clearing and grubbing, installing silt fences, constructing access roads, and installing site security measures) at the former Plainwell Impoundment, continued construction of Staging Area 1N, installed two staff gauges, received a shipment of geomembrane material for Staging Area 1N, and requested proposals for the installation of the cofferdam system and the water control structure. Samples K25707 and K25708 were collected.
- During the week of May 29, the KRSG continued site preparation (clearing and grubbing, installing silt fences, constructing access roads, and installing site security measures) at the former Plainwell Impoundment, installed one staff gauge, installed turbidity curtains in Removal Area 1, installed the geomembrane liner and geotextile fabric at Staging Area 1N, and installed four regulatory buoys and three informational signs associated with the MDNR's closing of the Kalamazoo River. Concrete samples from Aggregate Industries, Samples K25709 through K25712, were collected.

Laboratory Data Received During the Period

- During the week of May 7, the KRSG received waste profile laboratory data for two samples collected from Removal Area 1 (Table B).
- During the week of May 14, the KRSG received pre-construction PCB sampling data for one composite sample collected from Staging Area 1N, two grab samples collected from the access road between Staging Area 1N and Removal Area 2, one grab sample from the access road between Staging Area 1N and Removal Area 4, and three grab samples from the access road between Removal Area 1 and Staging Area 1N (Table B).
- During the week of May 21, the KRSG received laboratory data for two concrete samples collected from Aggregate Industries for the potential use as an aggregate material for construction (Table B).

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- During the week of May 29, the KRSG also received laboratory data for geotechnical sampling conducted at the Allied OU in March 2007 (Table C).

Issues Encountered and Actions Taken

- Staging Area 1N. The proposed layout and organization of Staging Area 1N were determined to be inadequate and inefficient. The KRSG verbally recommended changes to the layout and organization of Staging Area 1N to the USEPA and the MDEQ on May 9. Both agencies approved the recommended changes.
- Staging Area 4N. Staging Area 4N and the associated access road could not be constructed as proposed due to the April 2007 denial of access to the Robert Foster Trust property. Staging Area 4N will be relocated, and the KRSG continued to negotiate with Consumers Energy for permission to construct an access road to the new location.
- Staging Area 5S. The proposed location of Staging Area 5S conflicted with onsite activities that had been planned by the property owner, Aggregate Industries. The KRSG met with Aggregate Industries on May 8 to discuss alternate locations for Staging Area 5S. Aggregate Industries was willing to allow the KRSG to construct Staging Area 5S elsewhere on Aggregate Industries' property. The KRSG and Aggregate Industries continued to discuss an alternate location throughout May.

Developments Anticipated During the Next Reporting Period

- During the week of June 4, the KRSG is scheduled to notify the USEPA of the landfills to be used for soil and sediment removed during 2007 removal activities.
- During the week of June 4, the KRSG is scheduled to complete construction of Staging Area 1N and begin removal of soil from Removal Area 1.
- During the week of June 11, the KRSG is scheduled to submit the *Traffic Control Plan* to the USEPA for review.
- During the week of June 18, the KRSG is scheduled to complete soil removal from Removal Area 1.
- During the week of June 25, the KRSG tentatively plans to host a Monthly Stakeholders Meeting.
- Throughout June, the KRSG will continue to negotiate property access agreements, as required by Paragraph 23 of the TCRA AOC (Table A).
- Throughout June, the KRSG will, as necessary, continue to submit Subcontractor Qualification Notifications to the USEPA, as required by Paragraph 11 of the TCRA AOC.

**Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Former Plainwell Impoundment TCRA
May Monthly Report**

Table A — Summary of Property Access Agreements (as of May 31, 2007)

Property Owner	Date Sent	Status
A.C. Geenen Associates	3/19/2007	no response
Aggregate Industries	3/9/2007	in negotiations
Allen Robinson	3/9/2007	accepted
Balkema Excavating	3/9/2007	accepted
Brad Keeler	3/9/2007	accepted
City of Plainwell	3/9/2007	in negotiations
Consumers Energy	3/26/2006	in negotiations
Meijer, Inc.	3/9/2007	in negotiations
Plainwell Group LLC	3/21/2007	no response
Robert Foster Trust	3/16/2007	rejected
Robert Keeler Trust	3/9/2007	accepted
Rolfe Family Trust	3/9/2007	accepted
Shirley Foster	3/16/2007	no response
Steven Peterson	3/9/2007	accepted

**Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
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Table B — Summary of Samples Collected and Data Received in May 2007

Sample ID	Sample Date	Data Received	Sample Matrix	Sample Location	Analysis Conducted										
					TPH	Total PCBs	TCL VOCs	TCL SVOCs	RCRA Metals	TCL Pesticides	Reactivity, Corrosivity, & Instability	Herbicides/Pesticides	TCLP Metals	TCLP VOCs	TCLP SVOCs
WC-A1-050707	05/07/07	05/11/07	Soil	RA 1 Waste Characterization		X					X	X	X	X	X
WC-A3-050707	05/07/07	05/11/07	Soil	RA 1 Waste Characterization		X					X	X	X	X	X
K25700	05/10/07	05/18/07	Soil	Access road from RA 2 to SA 1N		X									
K25701	05/10/07	05/18/07	Soil	Access road from RA 2 to SA 1N		X									
K25702	05/10/07	05/18/07	Soil	Access road from RA 4 to SA 1N		X									
K25703	05/10/07	05/18/07	Soil	Haul road along the west side of SA 1N		X									
K25704	05/10/07	05/18/07	Soil	Haul road along the west side of SA 1N		X									
K25705	05/10/07	05/18/07	Soil	Haul road along the west side of SA 1N		X									
K25706	05/10/07	05/18/07	Soil	Composite sample for SA 1N		X									
K25707	05/18/07	05/25/07	Concrete	Concrete from Aggregate Industries	X	X	X	X	X	X					
K25708	05/18/07	05/25/07	Concrete	Concrete from Aggregate Industries	X	X	X	X	X	X					
K25709	05/31/07	NR	Concrete	Concrete from Aggregate Industries	X	X	X	X	X	X					
K25710	05/31/07	NR	Concrete	Concrete from Aggregate Industries	X	X	X	X	X	X					
K25711	05/31/07	NR	Concrete	Concrete from Aggregate Industries	X	X	X	X	X	X					
K25712	05/31/07	NR	Concrete	Concrete from Aggregate Industries	X	X	X	X	X	X					

Notes:

NR - Analytical results not yet received.

RA - Removal Area.

SA - Staging Area.

**Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
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May Monthly Report**

Table C — Summary of Geotechnical Laboratory Test Data

Boring Number	Sample Depth (ft)	Sample Description and USCS Classification	Unit Weight		Percent Finer No. 200 Sieve	Specific Gravity	Natural Moisture Content (%)	Atterberg Limits		
			Wet	Dry				LL	PL	PI
SD-1	12-14	paper-making residuals	87.8	45	80.2	2.36	95.2	48	34	14
SD-2	8-10	paper-making residuals	105.9	76.8	59.8	2.72	37.9	48	24	24
SD-4	4-6	paper-making residuals	87.5	43	78.6	2.45	103.4	97	57	40
SD-6	16-18	paper-making residuals	NA	NA	NA	NA	61.1	NA	NA	NA
SD-7	7-9	paper-making residuals	64.9	46.4	92.3	2.4	96.5	43	29	14

Notes:

NA - not analyzed.